

[Helenpricejohnson2020](#) replied (Tue, 27 Oct 2020 at 9:52 AM)

To: "PDC Support" pdcc@pdcc.wa.gov

Hello Tabatha,

Thank you for the brief conversation this morning and your direction to provide additional information.

Regarding the alleged violation One: non-reporting of the expenditure in a timely manner

- The invoice for the Comcast/media purchase for \$150,000 was emailed to the campaign on October 5th.
- The invoice was paid by check and sent in USPS mail on October 7th.
- The check was received by the consultant on October 13th and immediately deposited.
- The check was cleared in the campaign bank account on October 14th.
- October 12th was a bank and USPS holiday.
- The C4 time frame, due on October 13th covers 9/1 through 10/12.
- The C4 dated 10/13/2020 did not include the Comcast \$150,000 invoice since it had not cleared the campaign bank account.
- This was not a "vendor debt" because it was not "more than 5 business days" per the WAC definition.
- I thought that my training directed C3 and C4 reporting to coincide with the bank balance and the C4 summary actually has a cash summary, which I try to match.
- The \$150,000 media buy expense will be on the C4 due today, Oct. 27.

Regarding the alleged violation Two:

- The September media buy through Cerillion N4 and Comcast was made and appears on the C4 with 9/15/2020 dates.
- The C4 does not include the detail in ORCA. I've attached a screen shot of the record.
- Earlier in the campaign, I asked specifically about the level of detail required for filing digital ads and cable TV ads. The PDC staff replied and it is also attached.

Please help with clarification of the Comcast expense. Should it be a revision to the C4 dated October 13th or included on the October 27th C4 due today?

I will refile with corrections or include the expense in question at your direction.

I am concerned that my lack of understanding of the expense reporting time frames, level of detail needed in the description line versus the memo line, etc. caused these alleged violations.

Thank you.

Margaret Andersen, campaign treasurer and compliance person
425-749-2027